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Attorneys for Defendant**

**UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW JERSEY**

EQUIPPED LLC T/A eFurb

Plaintiff,

vs.

**DIALECTIC DISTRIBUTION, LLC,
JOHN/JANE DOES 1-10, and ABC
CORPORATIONS 1-10**

Defendant(s).

Case No. 2:18-cv-12394

Civil Action

**CERTIFICATION OF DAVID
RUBENSTEIN IN SUPPORT OF
NOTICE OF REMOVAL**

David Rubenstein, of full age, does hereby certify as follows:

1. I have personal knowledge of the facts set forth herein and submit this Certification in support of Defendant's Notice of Removal.
2. Defendant asserts that there is complete diversity of citizenship between the Plaintiff and Defendant in this action.
3. Plaintiff Equipped, LLC is a New York Limited Liability Company. The Members of Plaintiff are not discoverable from the New York Business Search website. However, through online investigation, we found an article identifying Plaintiff's Co-Founders as Izzy Fischweicher and Yanky Lipsker. See <https://www.businessinsider.com/theres-a-stigma-with-buying-refurbished-products-and-this-guy-wants-to-turn-that-around-2015-8/>.

4. According to Twitter, Izzy Fischweicher resides in New York. See <https://twitter.com/izzyfisch>.
5. According to Facebook, Yanky Lipsker resides in New York. See <https://www.facebook.com/yankylipsker>.
6. Through conversations with opposing counsel, I have also learned that Equipped, LLC had two additional Members, Andy Sinha and Gary Gopalani. Opposing counsel has informed me that both of them live in New York.
7. Regarding Defendant Dialectic Distribution, LLC, it's sole Member is Zachary Zeltzer. He lives in Montclair, New Jersey. See <https://www.mylife.com/zachary-zeltzer/e13873964203080>
8. Since all of the Members of the Plaintiff reside in New York, and the sole Member of the Defendant resides in New Jersey, complete diversity of citizenship exists.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 15, 2018

s/David Rubenstein
David Rubenstein